

Exhibit A

AFFIDAVIT OF LEIGH-ANNE LEE

Comes now the affiant, Leigh-Anne Lee, who, having first been duly sworn, states that the following statements are true in regards to Plaintiff Ronda Burns:

1. All of the statements contained in this Affidavit are true and correct and made on the basis of my personal knowledge. I am an adult citizen of the State of Tennessee, over the age of 18 years, and am competent to make the statements contained in this Affidavit. I am a legal assistant with Galligan and Newman.

2. On July 8, 2013, I mailed by certified mail, return receipt requested a Notice letter and enclosures to Saint Thomas Outpatient Neurosurgical Center, LLC at both the addresses for the agent of service of process (Gregory B. Lanford, M.D., 2011 Murphy Ave, Ste. 301, Nashville, TN 37203-2023) and the provider's current business address (Floor 9, 4230 Harding Pike, Nashville, TN 37205-2013 and I obtained certificates of mailing from the United States Postal Service stamped with the date of mailing as required by Tennessee Code Annotated § 29-26-121 (a).

3. I attach as Exhibit 1 a copy of the Notice letter sent to Saint Thomas Outpatient Neurosurgical Center, LLC along with the copies of the enclosures to the letter which include a list of the names and addresses of all healthcare providers who were served Notice pursuant to Tennessee Code Annotated § 29-26-121 (a) and a HIPAA compliant medical authorization permitting Saint Thomas Outpatient Neurosurgical Center, LLC to obtain complete medical records from each other provider being sent a Notice.

4. I attach as Exhibit 2 copies of the Certificates of Mailing from the United States Postal

Service, stamped with the date of mailing of the Notice and enclosures to Saint Thomas Outpatient Neurosurgical Center, LLC.

5. On July 8, 2013, I mailed by certified mail, return receipt requested a Notice letter and enclosures to Howell Allen Clinic A Professional Corporation at the address for the agent for service of process (Gregory B. Lanford, M.D., 2011 Murphy Ave, Ste. 301, Nashville, Tn 37203-2023) and the provider's current business address (2011 Murphy Avenue, Suite 301, Nashville, TN 37203-2023) and I obtained a certificate of mailing from the United States Postal Service stamped with the date of mailing as required by Tennessee Code Annotated § 29-26-121 (a).

6. I attach as Exhibit 3 a copy of the Notice letter sent to Howell Allen Clinic A Professional Corporation along with copies of the enclosures to the letter which include a list of the names and addresses of all healthcare providers who were served Notice pursuant to Tennessee Code Annotated § 29-26-121 (a) and a HIPAA compliant medical authorization permitting Howell Allen Clinic A Professional Corporation to obtain complete medical records from each other provider being sent a notice.

7. I attach as Exhibit 4 a copy of the Certificate of Mailing from the United States Postal Service, stamped with the date of mailing of the Notice and enclosures to Howell Allen Clinic A Professional Corporation.

8. On July 8, 2013 I mailed by certified mail, return receipt requested a Notice letter and enclosures to Debra Schamberg, R.N., (Howell Allen Clinic, 2011 Murphy Ave., Suite 301, Nashville, TN 37203) and I obtained certificates of Mailing from the United States Postal Service stamped with the date of mailing as required by Tennessee Code Annotated § 29-26-121 (a).

9. I attach as Exhibit 5 a copy of the Notice letter sent to Debra Schamberg, R.N. along with copies of the enclosures to the letter which include a list of the names and addresses of all

healthcare providers who were served Notice pursuant to Tennessee Code Annotated § 29-26-121 (a) and a HIPAA compliant medical authorization permitting Debra Schamberg, R.N. to obtain complete medical records from each other provider being sent a notice.

10. I attach as Exhibit 6 copies of the Certificates of Mailing from the United States Postal Service, stamped with the date of mailing of the Notice and enclosures to Debra Schamberg, R.N.

11. On July 8, 2013, I mailed by certified mail, return receipt requested a Notice letter and enclosures to John W. Culclasure, M.D. at the address listed for Dr. Culclasure on the Tennessee Department of Health website (Howell Allen Clinic, 2011 Murphy Ave., Suite 301, Nashville, TN 37203) and at the provider's current business address (Saint Thomas Outpatient Neurosurgical Center, LLC, 2011 Murphy Ave., Ste. 301, Nashville, TN 37203-2023) and I obtained certificates of mailing from the United States Postal Service stamped with the date of mailing as required by Tennessee Code Annotated § 29-26-121 (a).

12. I attach as Exhibit 7 a copy of the Notice letter sent to John W. Culclasure, M.D., along with copies of the enclosures to the letter which include a list of the names and addresses of all healthcare providers who were served Notice pursuant to Tennessee Code Annotated § 29-26-121 (a) and a HIPAA compliant medical authorization permitting John W. Culclasure, M.D. to obtain complete medical records from each other provider being sent a notice.

13. I attach as Exhibit 8 copies of the Certificates of Mailing from the United States Postal Service, stamped with the date of mailing of the Notice and enclosures to John W. Culclasure, M.D.

14. On July 8, 2013, I mailed by certified mail, return receipt requested a Notice letter and enclosures to Saint Thomas Hospital at both the address for the agent for service of process (E.

Berry Holt, III, Suite 800, 102 Woodmont Blvd., Nashville, Tn 37205-2221) and the provider's current business address (4220 Harding Pike, Nashville, TN 37205-2005) and I obtained certificates of mailing from the United States Postal Service stamped with the date of mailing as required by Tennessee Code Annotated § 29-26-121 (a).

15. I attach as Exhibit 9 a copy of the Notice letter sent Saint Thomas Hospital along with copies of the enclosures to the letter which include a list of the names and addresses of all healthcare providers who were served Notice pursuant to Tennessee Code Annotated § 29-26-121 (a) and a HIPAA compliant medical authorization permitting Saint Thomas Hospital to obtain complete medical records from each other provider being sent a notice.

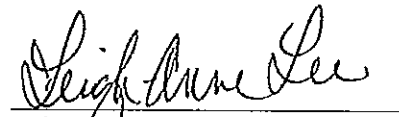
16. I attach as Exhibit 10 copies of the Certificates of Mailing from the United States Postal Service, stamped with the date of mailing of the Notice and enclosures to Saint Thomas Hospital.

17. On July 8, 2013, I mailed by certified mail, return receipt requested a Notice letter and enclosures to Saint Thomas Health Services at the address for the agent for service of process (E. Berry Holt, III, Ste. 800, 102 Woodmont Blvd., Nashville, Tn 37205-2221) and the provider's current business address (Suite 800, 102 Woodmont Blvd, Nashville, TN 37205) and I obtained a certificate of mailing from the United States Postal Service stamped with the date of mailing as required by Tennessee Code Annotated § 29-26-121 (a).

18. I attach as Exhibit 11 a copy of the Notice letter sent to Saint Thomas Health Services along with copies of the enclosures to the letter which include a list of the names and addresses of all healthcare providers who were served Notice pursuant to Tennessee Code Annotated § 29-26-121 (a) and a HIPAA compliant medical authorization permitting Saint Thomas Health Services to obtain complete medical records from each other provider being sent a notice.

19. I attach as Exhibit 12 a copy of the Certificate of Mailing from the United States Postal Service, stamped with the date of mailing of the Notice and enclosures to Saint Thomas Health Services.

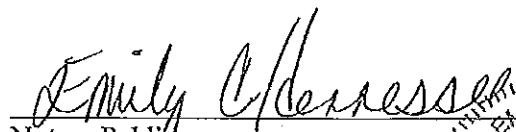
FURTHER AFFIANT SAITH NOT.


Leigh Anne Lee

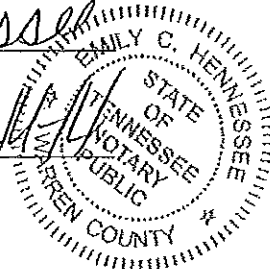
STATE OF TENNESSEE

COUNTY OF WARREN

Sworn to and subscribed before me this 17 day of September, 2013.


Notary Public

My Commission Expires: 9/14/14



LAW OFFICES OF
GALLIGAN & NEWMAN

Exhibit 1

Michael D. Galligan Robert W. Newman Susan N. Marttala John P. Parth Benjamin R. Newman M. Trevor Galligan

July 8, 2013

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

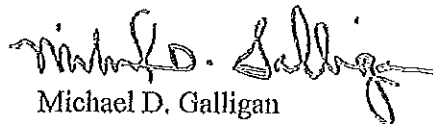
Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUHB-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:

Health information covering treatment from August 1, 2012 to present

☐ Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.)

☐ Summary

☐ Copy of Medical Records only

☐ Discharge Summary (DS)

☐ Copy of Complete Records (Medical & Financial)

☒ Operative/Procedure Report(OP)

☐ History and Physical (H&P)

☐ Pathology Report

☐ Consultation

☐ Laboratory Report

Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

4. I understand that I have a right to revoke this authorization at any time. I understand that, if I revoke this authorization, I must do so in writing and present my written revocation to the Health Information Management department. I understand that my revocation will not apply to the extent that the above named provider has taken action in reliance on this authorization. I understand that my revocation will not apply if this authorization was obtained as a condition of obtaining insurance coverage and the law provides my insurer with the right to contest a claim under my policy or the policy itself. Unless otherwise revoked, this authorization will expire on the following date, event or condition: _____. If I fail to specify an expiration date, event, or condition, this authorization will expire in six months.

5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns
Signature of Patient or Legal Representative

7/8/2013
Date

LAW OFFICES OF
GALLIGAN & NEWMAN

Michael D. Galligan Robert W. Newman Susan N. Marttala John P. Patton Benjamin R. Newman M. Trevor Galligan

July 8, 2013

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:


Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
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Saint Thomas Outpatient Neurosurgical Center, LLC
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St. Thomas Hospital
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St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

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2011 Murphy Ave.
Nashville, TN 37203

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Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
 Health information covering treatment from August 1, 2012 to present

<input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.)	<input type="checkbox"/> Summary
<input type="checkbox"/> Copy of Medical Records only	<input type="checkbox"/> Discharge Summary (DS)
<input type="checkbox"/> Copy of Complete Records (Medical & Financial)	<input checked="" type="checkbox"/> Operative/Procedure Report(OP)
<input type="checkbox"/> History and Physical (H&P)	<input type="checkbox"/> Pathology Report
<input type="checkbox"/> Consultation	<input type="checkbox"/> Laboratory Report

 Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

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5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns 7/8/2013
 Signature of Patient or Legal Representative Date

Exhibit 2

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$.66
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.31

Postmark Here
 JUL 09 2013
 McMINNVILLE TN

7012 0470 0001 4942 2533

Sent to: Saint Thomas Outpatient Neurological Center, LLC
 Street, Apt. No., or PO Box No. 4230 Harding Pike
 City, State, ZIP+4 Nashville, TN 37205-2005

UNITED STATES POSTAL SERVICE® **Certificate of Mailing**

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form may be used for domestic and international mail.

From: Shulligan + Newman
309 W Main St
McMinnville, TN 37110

To pay the meter post

10300



To: Saint Thomas Outpatient Neurological Center, LLC
 FL 9
 4230 Harding Pike
 Nashville, TN 37205-2005

U.S. POSTAGE
 PAID
 McMINNVILLE, TN
 JUL 09, 13
 PERMIT
 00015073-12

PS Form 3817, April 2007 PSN 7530-02-000-9085

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<input checked="" type="checkbox"/> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature x <u>Debra Schamberger</u> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
1. Article Addressed to: <u>Saint Thomas Outpatient Neurological Center, LLC</u> <u>FL 9</u> <u>4230 Harding Pike</u> <u>Nashville, TN 37205-2005</u>		B. Received by (Printed Name) <u>Debra Schamberger</u> C. Date of Delivery <u>7-10-13</u>	
2. Article Number (Transfer from service label) <u>7012 0470 0001 4942 2533</u>		D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> O.O.D.		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

PS Form 3811, February 2004

Domestic Return Receipt

102895-02-M-1640

7012 0470 0001 4942 2557

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information, visit us at www.usps.com

OFFICIAL USE

Postage	\$.66
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.31

Postmark Here
 McMinnville TN
 JUL 09 2013

Sent To: Saint Thomas Outpatient Neuro Center, LLC
 Street, Apt. No., or PO Box No.: c/o Gregory B. Lanford, MD
 City, State, ZIP: 2011 Murphy Ave, Ste. 301
 Nashville, TN 37203-2023

PS Form 3817, April 2007 PSN 7530-02-000-8065

UNITED STATES POSTAL SERVICE Certificate of Mailing

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form may be used for domestic and international mail.

From: Gallagher & Neuman
20910 Main St
McMinnville, TN 37110

To: Saint Thomas Outpatient Neuro Center, LLC
c/o Gregory B. Lanford, MD
2011 Murphy Ave, Ste. 301
Nashville, TN 37203-2023

PS Form 3817, April 2007 PSN 7530-02-000-8065



U.S. POSTAGE
 \$1.20
 JUL 09 2013
 McMinnville, TN
 00015073-12

SENDER: COMPLETE THIS SECTION

☒ Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
☒ Print your name and address on the reverse so that we can return the card to you.
☒ Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:
Saint Thomas Outpatient Neuro Surgical Center, LLC
c/o Gregory B. Lanford, MD
2011 Murphy Ave, Ste 301
Nashville, TN 37203-2023

Article Number
 Transfer from service label

COMPLETE THIS SECTION ON DELIVERY

A. Signature
G. Neuman

B. Received by (Printed Name)
G. Neuman

C. Date of Delivery
JUL 09 2013

D. Is delivery address different from Item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

7012 0470 0001 4942 2557

Form 3811, February 2004 Domestic Return Receipt

LAW OFFICES OF
GALLIGAN & NEWMAN

Exhibit 3

Michael D. Galligan Robert W. Newman Susan N. Marttala John P. Partin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

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You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

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RONDA BURNS

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2011 Murphy Ave. Suite 301
Nashville, TN 37203

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Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
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Nashville, TN 37203-2023

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Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
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Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
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Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
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AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
 Health information covering treatment from August 1, 2012 to present

<input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.)	<input type="checkbox"/> Summary
<input type="checkbox"/> Copy of Medical Records only	<input type="checkbox"/> Discharge Summary (DS)
<input type="checkbox"/> Copy of Complete Records (Medical & Financial)	<input checked="" type="checkbox"/> Operative/Procedure Report(OP)
<input type="checkbox"/> History and Physical (H&P)	<input type="checkbox"/> Pathology Report
<input type="checkbox"/> Consultation	<input type="checkbox"/> Laboratory Report

 Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

4. I understand that I have a right to revoke this authorization at any time. I understand that, if I revoke this authorization, I must do so in writing and present my written revocation to the Health Information Management department. I understand that my revocation will not apply to the extent that the above named provider has taken action in reliance on this authorization. I understand that my revocation will not apply if this authorization was obtained as a condition of obtaining insurance coverage and the law provides my insurer with the right to contest a claim under my policy or the policy itself. Unless otherwise revoked, this authorization will expire on the following date, event or condition: _____. If I fail to specify an expiration date, event, or condition, this authorization will expire in six months.

5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns
 Signature of Patient or Legal Representative

7/8/2013
 Date

LAW OFFICES OF
GALLIGAN & NEWMAN

Michael D. Galligan Robert W. Newman Susan N. Mattala John E. Partin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, VA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUHB-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNSdo/b: 11/19/1962SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

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Health information covering treatment from August 1, 2012 to present

- | | |
|--|--|
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| <input type="checkbox"/> Copy of Medical Records only | <input type="checkbox"/> Discharge Summary (DS) |
| <input type="checkbox"/> Copy of Complete Records (Medical & Financial) | <input checked="" type="checkbox"/> Operative/Procedure Report(OP) |
| <input type="checkbox"/> History and Physical (H&P) | <input type="checkbox"/> Pathology Report |
| <input type="checkbox"/> Consultation | <input type="checkbox"/> Laboratory Report |

Other: _____

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Ronda Burns

Signature of Patient or Legal Representative

7/8/2013

Date

Exhibit 4

7012 0470 0001 4942 2601

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 6.60
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$12.31

Postmark Here
 JUL 09 2013
 MCMINNVILLE, TN

Sent to: Howell Allen Clinic, A Professional Corp.
C/O Gregory B. Landford, MD
2011 Murphy Ave, Ste 301
Nashville, TN 37203-2023

Street, Apt. No.,
 or PO Box No.
 City, State, ZIP+4

PS Form 3811, April 2007 PSN 7530-02-000-9085

UNITED STATES POSTAL SERVICE®

Certificate of Mailing

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.
 This item is for use in domestic and international mail.

From: Lulligan & Neuman
201 W. Main St
McMinnville, TN 37110

To: Howell Allen Clinic, A Professional Corp.
C/O Gregory B. Landford, MD
2011 Murphy Ave, Ste 301
Nashville, TN 37203

U.S. POSTAGE
 PAID
 MCMINNVILLE, TN
 37110
 JUL 09 2013
 PERMIT
 00015073-12

To pay fee
 meter ps

1000

PS Form 3817, April 2007 PSN 7530-02-000-9085

SENDER: COMPLETE THIS SECTION

☒ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
☒ Print your name and address on the reverse so that we can return the card to you.
☒ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Howell Allen Clinic, A Professional Corp.
C/O Gregory B. Landford, MD
2011 Murphy Ave, Ste. 301
Nashville, TN 37203-2023

2. Article Number
 (Transfer from service label) 7012 0470 0001 4942 2601

COMPLETE THIS SECTION ON DELIVERY

A. Signature
Xy McQueen ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

PS Form 3811, February 2004 Domestic Return Receipt 102535-02-11-1540

7012 0470 0001 4442 2564

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$.46
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.31

Postmark Here
 JUL 09 2013
 McMINNVILLE TN

Sent to: Howell Allen Clinic
3011 Murphy Ave, Ste 301
Nashville, TN 37203-2023

USPS Form 3817, April 2007 PSN 7530-02-000-9065

UNITED STATES POSTAL SERVICE
Certificate of Mailing

To pay fee, at meter postbox 1003

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form is to be used for domestic and international mail.

From: Gelliger & Neuman
309 W. Main Street
McMinnville, TN 37110

To: Howell Allen Clinic, A Professional Corp
3011 Murphy Ave, Ste 301
Nashville, TN 37203-2023

PAID
 McMINNVILLE, TN
 JUL 09 13
 \$1.20
 00015073-12

PS Form 3817, April 2007 PSN 7530-02-000-9065

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<input type="checkbox"/> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature <u>X M Coo</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) _____ C. Date of Delivery _____ D. Is delivery address different from Item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: _____	
1. Article Addressed to: <u>Howell Allen Clinic</u> <u>3011 Murphy Ave, Ste 301</u> <u>Nashville, TN 37203-2023</u>		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number: (Transfer from service label) <u>7012 0470 0001 4442 2564</u>		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

PS Form 3817, February 2004 Domestic Return Receipt 102695-02-11-1840

LAW OFFICES OF
GALLIGAN & NEWMAN

Exhibit 5

Michael D. Galligan Robert W. Newman Susan M. Marttala John P. Partin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Nurse Schamberg:

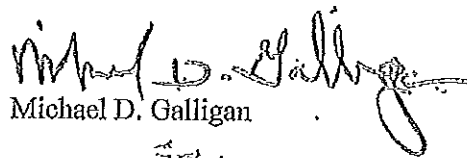
Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns is asserting a potential claim for medical malpractice against you. This claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

Enclosed herein is a list of the names and addresses of all providers being sent a notice. Also enclosed are HIPAA compliant medical authorizations permitting you to obtain complete medical records from each other provider being sent a notice.

Please forward this correspondence and enclosures to your professional liability insurance carrier and/or your legal counsel. Please ask your representative (either a representative from your professional liability insurance carrier or your legal counsel) to contact me.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
 Health information covering treatment from August 1, 2012 to present.

<input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.)	<input type="checkbox"/> Summary
<input type="checkbox"/> Copy of Medical Records only	<input type="checkbox"/> Discharge Summary (DS)
<input type="checkbox"/> Copy of Complete Records (Medical & Financial)	<input checked="" type="checkbox"/> Operative/Procedure Report(OP)
<input type="checkbox"/> History and Physical (H&P)	<input type="checkbox"/> Pathology Report
<input type="checkbox"/> Consultation	<input type="checkbox"/> Laboratory Report

 Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

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Ronda Burns
 Signature of Patient or Legal Representative

7/8/2013
 Date

Exhibit 6

0452 2444 7700 0447 2777

U.S. Postal Service
CERTIFIED MAIL, RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$.16
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.31

MAKINGVILLE, TN
JUL 09 2013

Sent To: Debra Schamberger, RN
Howell Allen Clinic
2011 Murphy Ave, Ste. 301
Nashville, TN 37203

PS Form 3800, August 2009 See back for instructions

UNITED STATES POSTAL SERVICE

Certificate of Mailing
 This Certified Mail provides evidence that mail has been presented to USPS for mailing.
 This form is required for domestic and international mail.

From: Sheligen & Kuman
309 W. Main St
McMinnville, TN 37110

To: Debra Schamberger, RN
Howell Allen Clinic
2011 Murphy Ave, Ste. 301
Nashville, TN 37203

U.S. POSTAGE
 PAID
 McMINNVILLE, TN
 JUL 09 2013
 PMOUNT
 \$1.20
 00015073-12

PS Form 3817, April 2007 PSN 7530-02-000-9065

SENDER: COMPLETE THIS SECTION

☐ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
☐ Print your name and address on the reverse so that we can return the card to you.
☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Debra Schamberger, RN
Howell Allen Clinic
2011 Murphy Ave, Ste. 301
Nashville, TN 37203

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X M. Ceece ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Article Number
 (Transfer from service label) 7012 0470 0001 4942 2540

Form 3811, February 2004 Domestic Return Receipt 102695-02-11-1540

LAW OFFICES OF
GALLIGAN & NEWMAN

Exhibit 7.

Michael D. Galligan Robert W. Newman Susan M. Marttala John P. Pertin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Dr. Culclasure:


Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

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You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o B. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

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RONDA BURNS

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Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

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2. The type and amount of information to be used or disclosed is as follows:
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|--|--|
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| <input type="checkbox"/> Copy of Medical Records only | <input type="checkbox"/> Discharge Summary (DS) |
| <input type="checkbox"/> Copy of Complete Records (Medical & Financial) | <input checked="" type="checkbox"/> Operative/Procedure Report(OP) |
| <input type="checkbox"/> History and Physical (H&P) | <input type="checkbox"/> Pathology Report |
| <input type="checkbox"/> Consultation | <input type="checkbox"/> Laboratory Report |

Other: _____

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5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns
Signature of Patient or Legal Representative

7/8/2013
Date

LAW OFFICES OF
GALLIGAN & NEWMAN

Michael D. Galligan Robert W. Newman Susan N. Martcala John P. Portin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Dr. Culclasure:

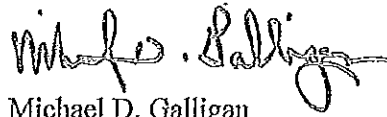
Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN



Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
Health information covering treatment from August 1, 2012 to present
- | | |
|--|--|
| <input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.) | <input type="checkbox"/> Summary |
| <input type="checkbox"/> Copy of Medical Records only | <input type="checkbox"/> Discharge Summary (DS) |
| <input type="checkbox"/> Copy of Complete Records (Medical & Financial) | <input checked="" type="checkbox"/> Operative/Procedure Report(OP) |
| <input type="checkbox"/> History and Physical (H&P) | <input type="checkbox"/> Pathology Report |
| <input type="checkbox"/> Consultation | <input type="checkbox"/> Laboratory Report |

Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.
4. I understand that I have a right to revoke this authorization at any time. I understand that, if I revoke this authorization, I must do so in writing and present my written revocation to the Health Information Management department. I understand that my revocation will not apply to the extent that the above named provider has taken action in reliance on this authorization. I understand that my revocation will not apply if this authorization was obtained as a condition of obtaining insurance coverage and the law provides my insurer with the right to contest a claim under my policy or the policy itself. Unless otherwise revoked, this authorization will expire on the following date, event or condition: _____. If I fail to specify an expiration date, event, or condition, this authorization will expire in six months.
5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns
Signature of Patient or Legal Representative

7/8/2013
Date

Exhibit 8

7012 0470 0001 4942 2625

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit us online at www.usps.com

OFFICIAL USE

Postage \$.66
 Certified Fee 3.10
 Return Receipt Fee (Endorsement Required) 2.55
 Restricted Delivery Fee (Endorsement Required)
 Total Postage & Fees \$ 6.31

Postmark Here
 McMinnville, TN
 JUL 09 2013
 U.S. POSTAGE

Sent To John W. Culclasure, M.D.
 Howell Allen Clinic
 Street, Apt. No., or PO Box No. 2011 Murphy Ave, Ste 301
 City, State, ZIP+4 Nashville, TN 37203

PS Form 3817, April 2007 PSN 7530-02-000-9065

UNITED STATES POSTAL SERVICE Certificate of Mailing

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form may be used for domestic and international mail.

From: Shalligat Neuner
309 W Main St
McMinnville, TN 37110

To: John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave, Ste 301
Nashville, TN 37203

PS Form 3817, April 2007 PSN 7530-02-000-9065

1.000

U.S. POSTAGE
 Paid
 McMinnville, TN
 JUL 09 2013
 \$1.20
 00015073-12

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p>John W. Culclasure, M.D. Howell Allen Clinic 2011 Murphy Ave, Ste 301 Nashville, TN 37203</p>		<p>A. Signature</p> <p><u>X M Neuner</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7012 0470 0001 4942 2625</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>			

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-11-1549

7012 0470 0001 4442 2632

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

FOR DELIVERY FROM THE U.S. MAIL ONLY

OFFICIAL USE

Postage	\$ 6.6
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.58
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 12.28

Postmark Here
 MO MINNIVILLE TN
 JUL 09 2013

Sent To: John W. Culclasure, MD
Saint Thomas Outpatient Neuro Center, LLC
 Street Apt. No. 3011 Murphy Ave, Ste 301
 or PO Box No.
 City, State, ZIP+4 Nashville, TN 37203-2023

PS Form 3811, April 2006

UNITED STATES POSTAL SERVICE Certificate of Mailing

To pay fee, meter post

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form may be used for domestic and international mail.

From: Gilligan + Newman
304 W Main St
McMinnville, TN 37110

To: John W Culclasure, MD
Saint Thomas Outpatient Neuro Center, LLC
3011 Murphy Ave, Ste 301
Nashville, TN 37203-2023

Postmark
 \$1.20
 JUL 09 13
 MO MINNIVILLE, TN
 00015673-12

U.S. POSTAGE PAID
 MO MINNIVILLE, TN
 37110
 JUL 09 13
 AMOUNT

PS Form 3817, April 2007 PSN 7530-02-000-9085

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p><input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p><input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.</p> <p><input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to: <u>John W. Culclasure, MD</u> <u>Saint Thomas Outpatient Neurological Center, LLC</u> <u>3011 Murphy Ave, Ste 301</u> <u>Nashville, TN 37203-2023</u></p> <p>2. Article Number (Transfer from service label) <u>7012 0470 0001 4442 2632</u></p>	<p>A. Signature <u>X.M. Cee</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

LAW OFFICES OF
GALLIGAN & NEWMAN

Exhibit 9

Michael D. Galligan Robert W. Newman Susan N. Marttala John R. Partin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

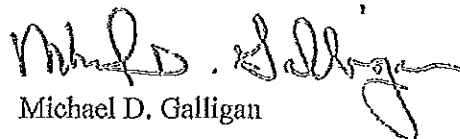
Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
 Health information covering treatment from August 1, 2012 to present.

<input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.)	<input type="checkbox"/> Summary
<input type="checkbox"/> Copy of Medical Records only	<input type="checkbox"/> Discharge Summary (DS)
<input type="checkbox"/> Copy of Complete Records (Medical & Financial)	<input checked="" type="checkbox"/> Operative/Procedure Report(OP)
<input type="checkbox"/> History and Physical (H&P)	<input type="checkbox"/> Pathology Report
<input type="checkbox"/> Consultation	<input type="checkbox"/> Laboratory Report

 Other: _____

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Ronda Burns 7/8/2013
 Signature of Patient or Legal Representative Date

LAW OFFICES OF
GALLIGAN & NEWMAN

Michael D. Galligan Robert W. Newman Susan N. Merttala John P. Partin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

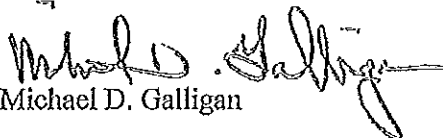
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You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
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Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
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Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o B. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o B. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

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Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

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4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUHB-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

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- | | |
|--|--|
| <input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.) | <input type="checkbox"/> Summary |
| <input type="checkbox"/> Copy of Medical Records only | <input type="checkbox"/> Discharge Summary (DS) |
| <input type="checkbox"/> Copy of Complete Records (Medical & Financial) | <input checked="" type="checkbox"/> Operative/Procedure Report(OP) |
| <input type="checkbox"/> History and Physical (H&P) | <input type="checkbox"/> Pathology Report |
| <input type="checkbox"/> Consultation | <input type="checkbox"/> Laboratory Report |

Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

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Ronda Burns
Signature of Patient or Legal Representative

7/8/2013
Date

Exhibit 10

7012 0470 0001 4942 2586

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)
 For delivery information visit us at www.usps.com

OFFICIAL USE

Postage	\$.66
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.58
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.34

Postmark Here
 McMinnville TN
 JUL 09 2013

Sent To: St. Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd
Nashville, TN 37205-2221

PS Form 3800, August 2000

UNITED STATES POSTAL SERVICE

Certificate of Mailing

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form is to be used for domestic and registered mail.

From: William J. Korman
309 W Main St
McMinnville, TN 37110

To: St. Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

PS Form 3817, April 2007 PSN 7530-02-000-9065

1.000

U.S. POSTAGE
 PAID
 McMinnville, TN
 JUL 09 2013
 AMOUNT
 \$1.20
 00015073-12

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<input type="checkbox"/> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee <u>W. Rodenburg</u>	
1. Article Addressed to: <u>St. Thomas Hospital</u> <u>c/o E. Berry Holt, III</u> <u>Suite 800</u> <u>102 Woodmont Blvd.</u> <u>Nashville, TN 37205-2221</u>		B. Received by (Printed Name) <u>W. Rodenburg</u>	
2. Article Number: (Transfer from service label) 7012 0470 0001 4942 2687		C. Date of Delivery <u>7/10/13</u>	
3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.		D. Is delivery address different from Item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes			

PS Form 3811, February 2004 Domestic Return Receipt 102695-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)
 For more information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$.66
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.31

Sent To: St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205

Postmark: McMinnville, TN JUL 09 2013

UNITED STATES POSTAL SERVICE® **Certificate of Mailing**
 This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.
 This form may be used for domestic and international mail.

From: Chellappa + Kuman
309 W Main St
McMinnville, TN 37110

To: St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

PS Form 3817, April 2007 PSN 7530-02-000-9085

1003

U.S. POSTAGE
 PAID
 McMINNVILLE, TN
 JUL 09 2013
 \$1.20
 90015073-12

SENDER: COMPLETE THIS SECTION

Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
 Print your name and address on the reverse so that we can return the card to you.
 Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:
St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205

Article Number
 (transfer from service label)
 Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature: [Signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name): R. M. [Signature]

C. Date of Delivery: 07/10/13

D. Is delivery address different from item 1? ☐ Yes ☐ No
 If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

7012 0470 0001 4942 2694

Domestic Return Receipt

LAW OFFICES OF
GALLIGAN & NEWMAN

Exhibit 11

Michael D. Galligan Robert W. Newman Susan N. Martala John P. Partin Benjamin R. Newman M. Trevor Galligan

July 8, 2013

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNS do/b: 11/19/1962 SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelvas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
Health information covering treatment from August 1, 2012 to present
- | | |
|--|--|
| <input type="checkbox"/> Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.) | <input type="checkbox"/> Summary |
| <input type="checkbox"/> Copy of Medical Records only | <input type="checkbox"/> Discharge Summary (DS) |
| <input type="checkbox"/> Copy of Complete Records (Medical & Financial) | <input checked="" type="checkbox"/> Operative/Procedure Report(OP) |
| <input type="checkbox"/> History and Physical (H&P) | <input type="checkbox"/> Pathology Report |
| <input type="checkbox"/> Consultation | <input type="checkbox"/> Laboratory Report |

Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

4. I understand that I have a right to revoke this authorization at any time. I understand that, if I revoke this authorization, I must do so in writing and present my written revocation to the Health Information Management department. I understand that my revocation will not apply to the extent that the above named provider has taken action in reliance on this authorization. I understand that my revocation will not apply if this authorization was obtained as a condition of obtaining insurance coverage and the law provides my insurer with the right to contest a claim under my policy or the policy itself. Unless otherwise revoked, this authorization will expire on the following date, event or condition: _____. If I fail to specify an expiration date, event, or condition, this authorization will expire in six months.

5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns
Signature of Patient or Legal Representative

7/8/2013
Date

LAW OFFICES OF
GALLIGAN & NEWMAN

Michael D. Galligan

Robert W. Newman

Susan N. Martela

John E. Parlin

Benjamin R. Newman

M. Trevor Galligan

July 8, 2013

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RE: RONDA BURNS
DOB: 11/19/1962
SS#: xxx-xx-5327

Dear Sirs:

Pursuant to Tenn. Code Ann. §29-26-121, please be advised that I am the attorney representing Ronda Burns and I am the authorized agent of Ronda Burns. Through me and my firm, Ms. Burns asserted a potential claim for medical malpractice against you by notice letter dated April 16, 2013. The potential claim arises out of epidural injections of methylprednisolone acetate administered to Ronda Burns at Saint Thomas Outpatient Neurosurgical Center, LLC, on August 17 and 31, 2012.

We have now extended this notice letter to additional health care providers. We are enclosing herein an updated list of the names and addresses of all providers being sent a notice and a HIPAA compliant medical authorization permitting you to obtain complete medical records from each other provider being sent a notice.

You should have already forwarded the previous notice letter and enclosures to your professional liability insurance carrier and/or your legal counsel. Please let them know of this update.

Sincerely,

GALLIGAN & NEWMAN


Michael D. Galligan

OTHER PROVIDERS RECEIVING THIS NOTICE 4/16/2013
RONDA BURNS

John W. Culclasure, M.D.
Howell Allen Clinic
2011 Murphy Ave. Suite 301
Nashville, TN 37203

John W. Culclasure, M.D.
Saint Thomas Outpatient Neurosurgical Center, LLC
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Timothy Schoettle, M.D.
Howell Allen Clinic
2011 Murphy Ave. Ste. 301
Nashville, TN 37203

Howell Allen Clinic, A Professional Corporation
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Howell Allen Clinic, A Professional Corporation
c/o Gregory B. Lanford, M.D.
2011 Murphy Avenue, Suite 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
c/o Gregory B. Lanford, M.D.
2011 Murphy Ave. Ste. 301
Nashville, TN 37203-2023

Saint Thomas Outpatient Neurosurgical Center, LLC
FL 9
4230 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
4220 Harding Pike
Nashville, TN 37205-2005

St. Thomas Hospital
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

Saint Thomas Health Services
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205

Saint Thomas Health Services
c/o E. Berry Holt, III
Suite 800
102 Woodmont Blvd.
Nashville, TN 37205-2221

OTHER PROVIDERS RECEIVING THIS NOTICE 7/8/2013
RONDA BURNS

Patricia Beckham
Baptist Women's Pavilion
2011 Murphy Ave.
Nashville, TN 37203

Martin S. Kelvas, Pharmacist
4065 Rotterdam Pass
Hampton, TA 30228

Martin S. Kelvas, Pharmacist
St. Thomas Hospital
P. O. Box 380
Nashville, TN 37202

Michael O'Neal
Vanderbilt University Medical Center
1211 MCD/VUH B-101
Nashville, TN 37232

Debra Schamberg, R.N.
Howell Allen Clinic
2011 Murphy Ave., Suite 301
Nashville, TN 37203

AUTHORIZATION FOR USE OR DISCLOSURE OF PROTECTED HEALTH INFORMATION

Patient Name: RONDA BURNSdo/b: 11/19/1962SS#: XXX-XX-5327

1. I authorize John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N., to Disclose my health information to John Culclasure, M.D., Timothy Schoettle, M.D., Howell Allen Clinic, Saing Thomas Outpatient Neurosurgical Center, LLC, St. Thomas Hospital, Saint Thomas Health Services, Patricia Beckham, Martin S. Kelyas, pharmacist, Michael O'Neal, Debra Schamberg, R.N. The purpose(s) for the use or disclose is as follows: Litigation

2. The type and amount of information to be used or disclosed is as follows:
Health information covering treatment from August 1, 2012 to present

☐ Abstract (includes H&P, Progress Notes, Procedure Notes, Procedure Reports, etc.)

☐ Summary

☐ Copy of Medical Records only

☐ Discharge Summary (DS)

☐ Copy of Complete Records (Medical & Financial)

☒ Operative/Procedure Report(OP)

☐ History and Physical (H&P)

☐ Pathology Report

☐ Consultation

☐ Laboratory Report

Other: _____

3. I understand that my health information may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for drug and alcohol abuse.

4. I understand that I have a right to revoke this authorization at any time. I understand that, if I revoke this authorization, I must do so in writing and present my written revocation to the Health Information Management department. I understand that my revocation will not apply to the extent that the above named provider has taken action in reliance on this authorization. I understand that my revocation will not apply if this authorization was obtained as a condition of obtaining insurance coverage and the law provides my insurer with the right to contest a claim under my policy or the policy itself. Unless otherwise revoked, this authorization will expire on the following date, event or condition: _____. If I fail to specify an expiration date, event, or condition, this authorization will expire in six months.

5. I understand that authorizing the disclosure of this health information is voluntary. I can refuse to sign this authorization. The doctor or hospital may not condition treatment, payment, enrollment in its health plan, or eligibility for benefits on my signing this authorization. I understand that if I authorize the above named provider to disclose my health information, the health information may be subject to redisclosure by the recipient and may no longer be protected by certain federal privacy regulations. If I have any questions about disclosure of my health information I can contact the provider listed above.

Ronda Burns
Signature of Patient or Legal Representative

7/8/2013
Date

Exhibit 12

2012 0470 0001 4942 2588

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit us at www.usps.com

OFFICIAL USE

Postage	\$ 6.66
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 12.31

Postmark Here
 McMinnville TN
 JUL 09 2013

Sent to: St. Thomas Hospital
 c/o E. Berry Holt, III
 Suite 800
 102 Woodmont Blvd
 Nashville, TN 37205-2221

City, State, ZIP+4®

UNITED STATES POSTAL SERVICE® Certificate of Mailing

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form may be used for domestic and international mail.

From: Gallagher & Neuman
 309 W. Main St
 McMinnville, TN 37110

To: St. Thomas Hospital
 c/o E. Berry Holt, III
 Suite 800
 102 Woodmont Blvd
 Nashville, TN 37205-2221

U.S. POSTAGE
 PAID
 McMinnville, TN
 JUL 09 2013
 \$1.20
 00615073-12

PS Form 3817, April 2007 PSN 7530-02-000-9085

SENDER: COMPLETE THIS SECTION

☐ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
☐ Print your name and address on the reverse so that we can return the card to you.
☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Saint Thomas Health
 Services
 c/o E. Berry Holt, III
 Suite 800
 102 Woodmont Blvd.
 Nashville, TN 37205-2221

2. Article Number
 (Transfer from service label) 7012 0470 0001 4942 2588

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 xCPZ

☒ Agent
☐ Addressee

B. Received by (Printed Name)
 C. Date of Delivery
 7/10/13

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☒ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-000-1630

2012 0470 0001 4942 2656

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)

For delivery information, visit us at www.usps.com

OFFICIAL USE

Postage	\$ 6.36
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 12.01

Postmark Here
 McMinnville TN
 JUL 09 2013

Sent To: Saint Thomas Health Services
Suite 800
102 Woodmont Blvd
Nashville, TN 37205

US Form 3817, April 2007 PSN 7530-02-000-9065

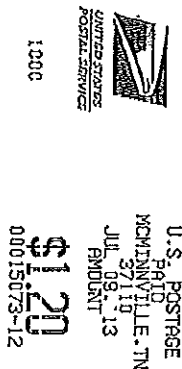
UNITED STATES POSTAL SERVICE Certificate of Mailing

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form is to be used for domestic and international mail.

From: Gilligan & Neuman
39 W Main St
McMinnville, TN 37110

To: Saint Thomas Health Services
Suite 800
102 Woodmont Blvd
Nashville, TN 37205

PS Form 3817, April 2007 PSN 7530-02-000-9065



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p><input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p><input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.</p> <p><input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <u>x OR</u></p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: <u>Saint Thomas Health Services</u> <u>Suite 800</u> <u>102 Woodmont Blvd.</u> <u>Nashville, TN 37205</u></p>		<p>B. Received by (Printed Name) <u>Chadwick</u></p> <p>C. Date of Delivery <u>7/10/13</u></p>	
<p>2. Article Number (Transfer from service label) <u>2012 0470 0001 4942 2656</u></p>		<p>D. Is delivery address different from item 1? If YES, enter delivery address below: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1640